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*Counsel for Judy Laird*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

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IN RE:	)	
	)	
	)	
PIER 1 IMPORTS, INC., et al. <sup>1</sup>	)	Chapter 11
	)	Case No. 20-30805-KRH
Debtor.	)	Jointly Administered
	)	

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**LIMITED OBJECTION TO THE AMENDED JOINT CHAPTER 11 PLAN OF PIER 1 IMPORTS, INC. AND ITS DEBTOR AFFILIATES AND RESERVATION OF RIGHTS**

Judy Laird (“Laird”) by counsel, hereby files her limited objection and reservation of rights (the “Objection”) with respect to the *Amended Joint Chapter 11 Plan of Pier 1 Imports, Inc. and its Debtor Affiliates* (Docket No. 803), filed on June 24, 2020. In support of the Objection, Laird states as follows:

1. On March 19, 2020, Laird filed a *Motion for Relief from the Stay to Continue Pending Litigation in Harris County, Texas* [Docket No. 398] and, on March 26, 2020, the *Amended Motion for Relief from the Stay to Continue Pending Litigation in Harris County, Texas (Amended to Correct Name of Debtor, Pier 1 Imports (US), Inc.)* [Docket No. 427] (collectively, the “Motion”) seeking to adjudicate, liquidate, and obtain a judgment as to against Pier 1 Imports,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are set forth in the Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3]. The location of the Debtors’ service address is 100 Pier 1 Place, Fort Worth, Texas 76102.

(US), Inc. (“Pier 1”) in the District Court of Harris County, Texas (the “State Court Action”) and recover from Pier 1’s insurance policies.

2. Since on or about June 17, 2020, counsel for Laird and counsel for Pier 1 have been negotiating the terms of a *Stipulation and Agreed Order Regarding the Plaintiff’s Motion for Relief from the Stay Pursuant to 11 U.S.C. § 362(d) to Continue Pending Litigation* (the “Stipulation”). The Stipulation intends to resolve the Motion without further hearing before this Court. However, the terms of the Stipulation are still being negotiated to ensure that Laird may pursue her claims in the State Court Action which are covered by the applicable insurance policies and *not* from any contribution from Pier 1 who can be released from any financial obligations under applicable insurance policies which have coverage for Laird’s claims.

3. Article X of the Plan titled “Settlement, Release, Injunction, and Related Provision” contains a broad injunction on the continuation of such actions as the State Court Action (the “Plan Injunction”).

4. Laird objects to the Plan insofar as it would divest Laird of her rights to pursue the State Court Action or to otherwise impair Laird of her right to pursue the State Court Action in which the applicable insurance companies provide coverage.

5. Laird objects to the Plan and argues that she should be excluded from the Plan Injunction. Laird argues that she should be allowed to complete negotiation of the Stipulation. Should these negotiations fail, Laird should be allowed to bring the Motion for a hearing before this Court. Laird argues that her right to continue to pursue the State Court Action should not be foreclosed by the Plan Injunction.

6. This Objection is submitted without prejudice to, and with a full reservation of Laird’s rights, claims, defenses, and remedies, including the right to amend, modify, or supplement

this Objection at any time prior to the confirmation hearing on these or any issues related to the Plan, or to Laird's claims, to seek discovery, to raise objections and to introduce evidence at any hearing relating to this Objection, and does not in any way limit any other rights of Laird to object to the Plan, on any grounds, as may be appropriate under the circumstances of these proceedings.

Dated: July 23, 2020

Respectfully Submitted,

JUDY LAIRD

By /s/ Ronald A. Page, Jr.

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Counsel

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 23rd day of July 2020, I caused a copy of the foregoing to be served through the Court's EM/ECF system on all parties receiving notices in these cases. I also caused a copy of the foregoing to be served by email on the Service List (Core Parties and 2002 List).

By /s/ Ronald A. Page, Jr.

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Counsel